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October 25, 2010

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VIA ECF
Honorable Robert E. Gerber
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: In re Motors Liquidation Company
Chapter 11 - Case No. 09-50026

Dear Judge Gerber:

This office represents Rose Chevrolet, Inc., Halleen Chevrolet, Inc. and Andy Chevrolet Company (collectively, the "Ohio Dealers") in connection with the Motion to Enforce Sale Order filed by General Motors, LLC ("GM"), returnable before Your Honor on Tuesday October 26, 2010. Our office also represented Rally Auto Group, Inc. ("Rally") with respect to GM's Motion to Enforce Sale Order filed against Rally. It is respectfully submitted that the issues raised by the parties in the Rally Motion to Enforce Sale Order are virtually identical to the issues raised by the parties in the Ohio Dealers Motion to Enforce Sale Order. As Your Honor is aware, after Your Honor ruled against Rally, Rally filed a motion, pursuant to Federal Rule of Bankruptcy Procedure Rule 8005, for a stay pending appeal. That motion was only recently argued last Wednesday before the Honorable Robert P. Patterson, Jr. at the Southern District Court. At the conclusion of oral argument, Judge Patterson advised the parties that he would render his decision on Rally's motion within the next few days.

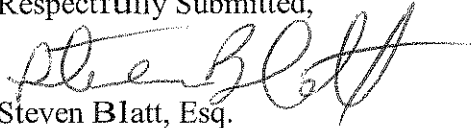
Again, as the issues to be decided by the Court in the Rally Motion to Enforce Sale Order are virtually identical to the issues raised by the parties in the Ohio Dealers

Honorable Robert E. Gerber
October 25, 2010
Page 2

Motion to Enforce Sale Order, and in an effort to save both judicial resources and the incurrence of additional counsel fees and time by the parties, I respectfully request a short adjournment of Tuesday's hearing pending the determination by Judge Patterson of Rally's Rule 8005 motion. I did contact GM's counsel and asked if GM would join in my application to adjourn Tuesday's hearing, however, GM's counsel has advised me that his client is not inclined to consent to such request.

For all the foregoing reasons, the Ohio Dealers respectfully request a short adjournment of Tuesday's hearing pending the determination by Judge Patterson of Rally's Rule 8005 motion.

Respectfully Submitted,



Steven Blatt, Esq.

All Counsel – Via ECF and Email